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Honorable Barbara S. Jones
United States District Judge
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 620
New York, New York 10007

Re: United States v. Frank Proscia, et al.
S2 06 Cr. 982 (BSJ)

Dear Judge Jones:

As you are aware, we represent Frank Proscia in the above-referenced matter. We are currently scheduled to appear before your Honor for a pretrial conference tomorrow, July 13, 2007, at 2:00 p.m. I respectfully request that the conference be adjourned for several days due to a scheduling conflict. I spoke to your Honor's chambers yesterday and was advised that your Honor is available on Tuesday, July 17, 2007, at 4:30 p.m. for the pretrial conference. Finally, we consent to the exclusion of time under the Speedy Trial Act.

I spoke to Assistant United States Attorney Katherine Goldstein about this brief adjournment and she consents. Additionally, I spoke to counsel for co-defendant Michael Annucci – Joseph DeMatteo, Esq. – and he too consents to this brief adjournment. Thank you for your consideration and if you have any questions or concerns, please do not hesitate to contact me.

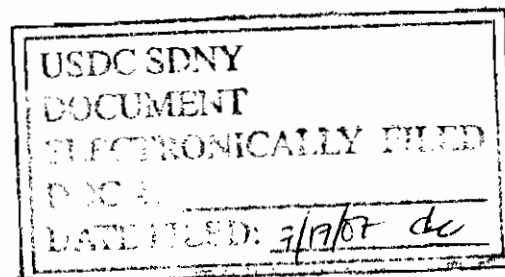
Sincerely,

Christopher L. Padurano

Christopher L. Padurano

cc: Lisa Zornberg
Katherine Goldstein
Assistant United States Attorneys (Via Facsimile)

Joseph R. DeMatteo, Esq. (Via Facsimile)



Application granted. The pretrial conference is adjourned to July 19, 2007 at 4:30PM. In the interest of justice for the reason stated below, Speedy trial time is excluded from July 17, 2007 to July 19, 2007 pursuant to 18 U.S.C. § 3161(h)(5)(A).

SO ORDERED
Dated:

Barbara S. Jones
BARBARA S. JONES
U.S.D.J.